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September 28, 2021

**VIA ECF**

The Honorable Tonianne J. Bongiovanni  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*  
Civil Action No. 19-17272-MAS-TJB

Dear Judge Bongiovanni:

This firm represents Defendants in the above-referenced matter. We write jointly on behalf of Defendants, Plaintiffs, and Counterclaim-Defendants Rightscorp, Inc. and Recording Industry Association of America (“RIAA”) to request a 7-day extension of: (1) the deadline to respond to Plaintiffs’ Motion to Dismiss RCN’s Amended Counterclaim (from October 4, 2021 to October 11, 2021) and (2) the deadline to respond to Rightscorp’s Motion to Dismiss RCN’s Amended Counterclaim (from October 4, 2021 to October 11, 2021). These deadlines were previously extended on one occasion, by application pursuant to L. Civ. R. 7.1(d)(5). *See* ECF No. 177. The parties also request a corresponding 7-day extension of the deadline for replies in support of the pending motions to dismiss (from October 12, 2021 to October 26, 2021). *See id.*

Due to obligations in other matters, overlapping deadlines, and related scheduling issues, counsel for Defendants require additional time to prepare their responses to the pending motions to dismiss and to consult with their clients about these matters. Good cause exists for the requested extensions, which are not being sought for purposes of delay. Further, the parties agree that these extensions are necessary and appropriate.

For these reasons, the parties respectfully request that the above deadlines be extended as follows for good cause shown: (1) the deadline to respond to Plaintiffs’ Motion to Dismiss RCN’s Amended Counterclaim (from October 4, 2021 to October 11, 2021), (2) the deadline to respond to Rightscorp’s Motion to Dismiss RCN’s Amended Counterclaim (from October 4, 2021 to October 11, 2021), and (3) the deadline for Plaintiffs and Rightscorp to reply to Defendants’ opposition to said motions to dismiss (from October 12, 2021 to October 26, 2021).

We have included a “So Ordered” provision at the end of this letter in the hope that this extension is acceptable to the Court.

Respectfully Submitted,

*/s/ Edward F. Behm, Jr.*

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this \_\_\_ day of September, 2021.

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The Honorable Tonianne J. Bongiovanni